

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

DANIEL KANG,

Plaintiff,

vs.

**THE MAYOR AND ALDERMEN OF
THE CITY OF SAVANNAH and ROY
W. MINTER, JR., Chief of Police for the
city of Savannah, Georgia, In His
Individual Capacity,**

Defendants.

Civil Action No.: 4:21-cv-111-RSB-CLR

STATUS REPORT

With the discovery period having now concluded in the above captioned case, the Parties make the following report to the Court.

I. DISCOVERY

A. Is all discovery completed in this case?

☐ Yes ☒ No

- If “No”, please list what discovery is remaining:

Plaintiff has requested a second deposition of former City Manager Pat Monahan. The parties have scheduled the deposition for April 13.

The Plaintiff has a copy of the City of Savannah Progressive Discipline Policy which became effective in November of 2020. Plaintiff seeks a copy of the Progressive Discipline Policy in effect at the time of Plaintiff’s termination, July and August of 2020. The City was notified today of this outstanding issue, is following up, and will respond to Plaintiff.

B. Are there any discovery issues which have been or will be brought before the Court for resolution?

☐ Yes ☒ No

- If “Yes”, please briefly explain:

II. SETTLEMENT

A. Have the parties made efforts to resolve this case?

☒ Yes ☐ No

- If “Yes”, please explain those efforts:

The parties have engaged in mediation and have otherwise had ongoing discussions regarding settlement.

B. Are the parties prepared to discuss settlement of this case with the Court at this time?

☒ Yes ☐ No

- If “No”, please explain:

[Click here to enter text.](#)

C. Are there any third parties and/or lien holders that should be included in any settlement discussions for this case?

☐ Yes ☒ No

- If “Yes”, please list those parties:

[Click here to enter text.](#)

- D. The Parties propose the following agreed upon dates, prior to the deadline for filing motions, for conducting a status conference. *(Please provide several dates for the Court's consideration in scheduling. Regardless of whether the Parties seek to discuss settlement, the Court may require that each party have a representative with full settlement authority present.)*

April 24; May 1

Note that the parties are contemporaneously seeking an extension of the current May 9 civil motions deadline due to pending outstanding discovery, the voluminous record, and schedules of counsel.

III. MOTIONS

- A. The Plaintiff(s) anticipate filing the following Motions:

- ☒ None
- ☐ Motion for Summary Judgment
- ☐ Motion to Exclude Expert Testimony
- ☐ Other Motion(s) (Except for Motions in Limine), please explain:

[Click here to enter text.](#)

- B. The Defendant(s) anticipate filing the following Motions:

- ☐ None
- ☒ Motion for Summary Judgment
- ☐ Motion to Exclude Expert Testimony
- ☐ Other Motion(s) (Except for Motions in Limine), please explain:

[Click here to enter text.](#)

IV. ADDITIONAL MATTERS

If there are any other matters regarding this case that the Parties seek to bring to the Court's attention at this time, please briefly explain:

None other than the parties' contemporaneously filed motion to extend the civil motions deadline.

Dated: April 11, 2023

s/ Brent Savage

Counsel for Plaintiff

s/Pat O'Connor

Counsel for The Mayor and Alderman of the City of Savannah

s/Shawn Kachmar

Counsel for Roy W. Minter, Jr.